

# EXHIBIT 60

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF JACKSON

In the Matter of:

Heidi Marie Brown,

Petitioner,

and

Arnaud Paris,

Respondent.

Case No. 22DR17285

**PETITIONER'S SECOND STATEMENT  
OF ATTORNEY FEES and REQUEST  
FOR SPECIAL FINDINGS OF FACT AND  
CONCLUSIONS OF LAW; and  
SUPPORTING DECLARATION OF  
COUNSEL**

**[ORCP 68]**

**STATEMENT OF ATTORNEY FEES AND COSTS**

The undersigned attorney represents to the Court, under penalties of perjury, that the following facts offered in support of an award of reasonable and necessary attorney fees are true:

1. Petitioner, hereinafter Mother, is entitled to recover attorney fees and costs pursuant to the *Limited Judgment for Custody, Parenting Time, and Child Support; and Money Awards*, dated December 28, 2023, which awarded Mother her attorney fees and costs, *id.* at p. 9; ORS 109.103; ORS 109.155; ORS 107.105(1)(j); ORS 109.811; the substantive provisions of ORCP 68, which allow a party to recover the reasonable value of the legal services related to the prosecution of an action, and not just the amount billed or paid itself, *see* ORCP 68 A(1); the procedural provisions of ORCP 68; and the supporting Declaration of Counsel, *infra*.

2. The number of hours and services rendered in this matter for each attorney and legal assistant and the hourly rates for each are set forth in detail on Exhibit 1. The total of reasonable attorney fees and costs sought is \$15,948.20.

Page 1 **PETITIONER'S SECOND STATEMENT OF ATTORNEY FEES and  
REQUEST FOR SPECIAL FINDINGS OF FACT AND CONCLUSIONS OF  
LAW; and SUPPORTING DECLARATION OF COUNSEL**

[Z:\CLIENTS\Brown, Heidi\Second Attorney Fee Statement emc.wpd]

BUCKLEY LAW P.C.  
5300 Meadows Rd., Suite 200  
Lake Oswego, OR 97035  
T: 503.620.8900 ~ F: 503.620.4878

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3. In accordance with ORS 20.075(1) and (2), the factors the Court should consider in determining a reasonable amount of attorney fees and costs as previously awarded are as follows:

(1) *A court shall consider the following factors in determining whether to award attorney fees in any case in which an award of attorney fees is authorized by statute and in which the court has discretion to decide whether to award attorney fees:*

(a) *The conduct of the parties in the transactions or occurrences that gave rise to the litigation, including any conduct of a party that was reckless, willful, malicious, in bad faith or illegal.*

This factor applies. From the start of this matter, despite the fact that he lived in Oregon, Father claimed he was a resident of France. In fact, in December 12, 2022, shortly after Mother had initiated this proceeding and before the parties had even litigated the residency issue, Father signed a sworn federal form under penalty of perjury which indicated he was not only a US citizen, but that he also resided not in France, but in California. *See Declaration of Counsel, infra.; see also Exhibit 2.* Father's brazen misrepresentations to the Court and to lawful authorities about the facts of this case are the source and sustenance of this ongoing litigation. *See Declaration of Counsel, infra.* His misrepresentations are foundational. *Id.* They are willful, they are malicious, they are in bad faith, and they are illegal. *Id.*

(b) *The objective reasonableness of the claims and defenses asserted by the parties.*

This factor applies. Mother was reasonable. *See Declaration of Counsel, infra.* Father was not. *Id.*

(c) *The extent to which an award of an attorney fee in the case would deter others from asserting good faith claims or defenses in similar cases.*

This factor does not apply.

(d) *The extent to which an award of an attorney fees in the case would deter others from asserting meritless claims and defenses.*

This factor applies. To the extent that others know about Father's actions, an award of attorney fees would encourage parties to work together to resolve conflict, rather than raise meritless defenses and abduct children, in violation of court orders.

(e) *The objective reasonableness of the parties and the diligence of the parties and their attorneys during the proceedings.*

This factor applies. Mother was reasonable and diligent. See Declaration of Counsel, *infra*. She sought discovery through counsel, and she sought to resolve the conflict. *Id.* Father was objectively unreasonable, and filed his own contradictory and obfuscatory pleadings. *Id.* In many ways, over the last year-plus, Father in this proceeding has attempted to establish himself as the preeminent vexatious litigant in the family law courts of the state of Oregon. He files bar complaints against any attorney who opposes him. His unreasonable, bad faith litigation has required Mother to continue being represented by an attorney, even when she can not afford representation.

(f) *The objective reasonableness of the parties and the diligence of the parties in pursuing settlement of the dispute.*

This factor applies. See Declaration of Counsel, *infra*.

(g) *The amount that the court has awarded as a prevailing party fee under ORS 20.190 (Prevailing party fees).*

This factor does not apply.

(h) *Such other factors as the court may consider appropriate under the circumstances of the case.*

This factor applies. See Declaration of Counsel.

(2) *A court shall consider the factors specified in subsection (1) of this section in determining the amount of an award of attorney fees in any case in which an*

award of attorney fees is authorized or required by statute. In addition, the court shall consider the following factors in determining the amount of an award of attorney fees in those cases:

(a) The time and labor required in the proceeding, the novelty and difficulty of the questions involved in the proceeding and the skill needed to properly perform the legal services.

This factor applies. Father's bad faith, *ad hominem* and injurious approach to litigation required extra time and labor. See Declaration of Counsel, *infra*.

(b) The likelihood, if apparent to the client, that the acceptance of the particular employment by the attorney would preclude the attorney from taking other cases.

This factor does not apply.

(c) The fee customarily charged in the locality for similar legal services.

This factor applies. Our fees are similar to others for skilled family law attorneys in the Portland metropolitan area, from whence both Father's former attorney and Mother's attorneys came. See Declaration of Counsel, *infra*. In fact, for the past months, I have not been charging Mother for my time. *Id.* Mother seeks attorney fees as defined by ORCP 68, i.e. the reasonable value of the legal services related to the prosecution of the action. ORCP 68 A(1). This Court has previously determined that the rates charged by Mother's attorneys support an award to Mother of fees. *Limited Judgment Re: Attorney Fees and Costs; and Money Award* at p. 2, entered January 2, 2024.

(d) The amount involved in the controversy and the results obtained.

This factor applies. See Declaration of Counsel, *infra*.

(e) The time limitations imposed by the client or the circumstances of the case.

This factor applies. See Declaration of Counsel, *infra*.



(f) *The nature and length of the attorney's professional relationship with the client.*

This factor applies. *See Declaration of Counsel, infra.*

(g) *The experience, reputation and ability of the attorney performing the services.*

This factor applies. *See Declaration of Counsel, infra.*

(h) *Whether the fee of the attorney is fixed or contingent.*

This factor does not apply.

4. In anticipation of efforts that will be spent defending this request, Mother seeks the additional sum of \$3,000.00, as explained more fully in the supporting *Declaration of Counsel*, below, which amount is based in large part on Father's history of intransigence, drawn out argumentation, *ad hominem* attacks on counsel and the court, and bad faith dealing in this proceeding.

5. Based upon the foregoing, Mother is entitled to an award of reasonable and necessary attorney fees and costs in the sum of \$18,948.20, as well as additional sums as requested above in the event Father objects to this *Statement*. Mother further requests special findings of fact and conclusions of law.

**DATED** this 11<sup>th</sup> day of January, 2024.

**BUCKLEY LAW P.C.**

By:

Taylor L. M. Murdoch, OSB #111307  
tlm@buckley-law.com  
of Attorneys for Petitioner/Mother

**SUPPORTING DECLARATION OF COUNSEL**

I, TAYLOR L. M. MURDOCH, declare as follows:

1           1.       I am the attorney for the Petitioner, hereinafter Mother, in this matter. I make this  
2       declaration in support of *Petitioner's Second Statement of Attorney Fees and Request for Special*  
3       *Findings of Fact and Conclusions of Law, supra.*

4           2.       Buckley Law P.C. performed the services itemized on the billing summary  
5       attached hereto, and by this reference incorporated herein as Exhibit 1. These services were for  
6       the period of time from May 31, 2023 to present. Mother was previously awarded her attorney  
7       fees regarding jurisdiction. *See Limited Judgment Re: Attorney Fees and Costs; Money Award,*  
8       which was entered on January 2<sup>nd</sup>, 2024. Mother seeks only an award for additional attorney fees  
9       services that were not previously awarded to her.

10          3.       All attorney fees incurred were reasonable and necessary in our efforts to obtain  
11       the *Limited Judgment Re: Custody, Parenting Time, and Child Support; and Money Awards,*  
12       entered on December 28, 2024. These services were performed at the hourly rates set forth in  
13       Exhibit 1. Costs incurred are reflected in summary on Exhibit 2.

14          4.       My hourly rate is \$395 per hour and was \$380 per hour in 2023. I am a shareholder  
15       in the firm of Buckley Law P.C. I have worked in litigation-oriented law firms for the last 17  
16       years, including in a capital defense trial litigation office in New Orleans, Louisiana, and in the  
17       Office of the Oregon Attorney General. I have been recognized as a rising star by Super Lawyers  
18       for 2018-2022. I am a former city prosecutor for the cities of Eugene and Springfield. I have  
19       practiced family law for twelve years, and have specialized in family law exclusively for the last  
20       ten years. Attorney Katelyn Skinner has practiced law for thirteen years, and represented Mother  
21       in her Hague litigation with Father in December, 2022, in which Mother prevailed. Attorney  
22       Katrina Seipel has practiced law for seven years. Attorney Noah Morss has practiced law for six  
23       years. Attorney Alexis Fisher Pooley has practiced family law for two years. Attorney Matthew  
24       Borghard has practiced family law for two years. Paralegal Wendy Goodyear has worked as a  
25       paralegal and legal assistant for twenty-five years. Paralegal Mark Warner has worked in family  
26       law for approximately twenty years. Paralegal Erin Culpepper has worked as a paralegal and

1 legal assistant for eleven years, exclusively in family law for six years. Legal assistant Megan  
 2 Johnson has been a legal assistant for one year, and has worked in family law for four years.  
 3 Legal assistant Monica Via has worked in law for approximately ten years.

4 5. On December 28, 2023 the Court awarded Mother her attorney fees and costs. As  
 5 noted above, by statute, "attorney fees" are not just the amount of fees an attorney charges a client  
 6 such as Mother. Attorney fees are the reasonable value of the legal services related to the  
 7 prosecution of an action. ORCP 68 A(1). The Court has previously determined that the rates  
 8 charged by Mother's attorneys are reasonable. *See Limited Judgment Re: Attorney Fees and*  
 9 *Costs; and Money Award*, entered herein on January 2, 2024.

10 6. The factors the court should consider in assessing attorney fees include the time  
 11 an attorney devotes to a case, the ultimate disposition, the complexity of the issues, the value of  
 12 interests involved, and the professional reputation of the attorney. *Ashley v. Garrison*, 162 Or  
 13 App 585, 591-592; 986 P.2d 654, 658 (1999). Whether Mother actually paid for the reasonable  
 14 value of the legal services related to the prosecution of the action is irrelevant. *Id.* I have not  
 15 been charging Mother for my time for months; she has actually incurred ongoing costs, however.  
 16 Accordingly, Mother has included in this *Statement* the attorney fees she has incurred at the  
 17 values her attorneys normally charge for them, whether or not she has been charged for them.

18 7. My firm has worked with Mother since her Hague Convention Proceeding in US  
 19 District Court in late 2022. I have known Mother since April, 2023. Mother is practical,  
 20 thoughtful, insightful, and devoted to her children. It has been my honor to advocate for her,  
 21 especially given the vexatious litigation that Father has foisted upon her.

22 8. This matter presented numerous complications, not least of which is Father's  
 23 belligerence toward anyone who stands in the way of his bad faith litigation. His ongoing  
 24 misrepresentations to lawful authorities have required a "whack-a-mole" approach and  
 25 consistently required my attention. To date, he has sought to register the French court's orders-  
 26 which are unenforceable in the United States under the UCCJEA- in approximately thirteen other



jurisdictions, as well as Multnomah County, Oregon. This egregious conduct alone encourages an award of attorney fees as requested against Father.

9. From the start, Father has claimed that this Court does not have jurisdiction over the children, because he was not a resident of the United States and continued to live in France. This argument, of course, was upon close review ridiculous. Father and the girls and Mother all lived in Ashland, Oregon at the time of the petition for custody was filed in October, 2022. As the Court found in the companion 23DR08269 case, "Father lived in Oregon October 7, 2022. He loves his children and would not live in France away from them." *Limited Judgment Re: Registration* at p. 10, signed August 18, 2023.

10. Father is a dual citizen of both the U.S. and France, and apparently makes whatever argument suits him for his residency, in any given situation. During the discovery in this matter, Mother obtained Father's immigration paperwork from his former employer, which he completed in December of 2022. *See Exhibit 2*. Father clearly indicated on his I-9 form that in December, 2022 his residential address was in Topanga, California. *Id.* at p. 1. Father acknowledged on the same document that he was a U.S. citizen. *Id.* His later protestations to this court that he remained a resident of France were in direct contravention to what he told his employer and U.S. immigration authorities.

11. Father was a resident of California for tax purposes; a resident of France for his arguments in court; and a resident of Oregon, and eventually Oregon and Texas, in fact.

12. When Father did not like the outcome of the hearing after he abducted the children, he attacked me personally. When the Court ruled against Father, he filed a federal lawsuit against it. The reason for the fees incurred herein is the same reason for Father's contemptuous actions: Father refuses to acknowledge this court's power over him. I have continued to advocate on Mother's behalf because doing so is the right thing to do.

13. In my experience with Father, whether through counsel or as a self-represented litigant, he insists on litigation, and makes it as difficult as possible, especially when it is obvious

1 his position is meritless. In the event that Father files an objection and a hearing is held on this  
2 matter, I expect an additional four to five hours of my time to respond to his objection and  
3 prepare a response, plus additional staff time. This would require an additional \$3,000 in attorney  
4 fees if required to defend against objections to the foregoing Statement.

5 14. For the foregoing reasons, Mother requests an award of attorney fees and costs in  
6 the sum of \$18,948.20.

7  
8 **I HEREBY DECLARE THAT THE ABOVE STATEMENTS ARE TRUE TO THE**  
9 **BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND THAT**  
10 **THEY ARE MADE FOR USE AS EVIDENCE IN COURT AND ARE SUBJECT TO**  
11 **PENALTY FOR PERJURY.**

12 **DATED** this 11<sup>th</sup> day of January, 2024.

13 **BUCKLEY LAW P.C.**

14 By: 

15 Taylor L. M. Murdoch, OSB #11307  
16 tlm@buckley-law.com  
17 of Attorneys for Petitioner/ Mother  
18  
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24  
25  
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**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing PETITIONER'S SECOND STATEMENT OF ATTORNEY FEES and REQUEST FOR SPECIAL FINDINGS OF FACT AND CONCLUSIONS OF LAW; and SUPPORTING DECLARATION OF COUNSEL on:

**Arnaud Paris  
13 Rue Ferdinand Duval  
Paris France 75004**

**Respondent/Father, *Pro Se***

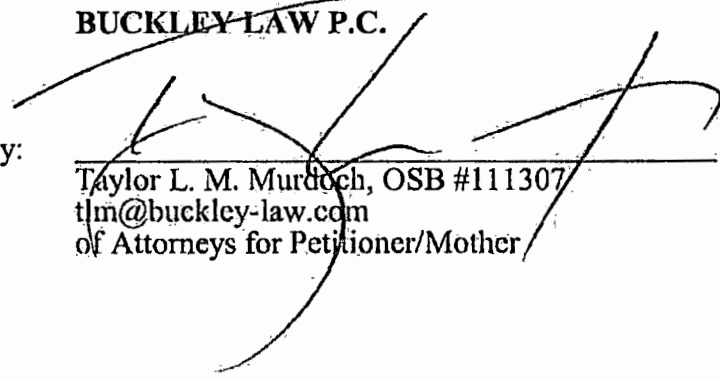
by the following indicated method or methods:

 by **emailing** a true copy to the individual above on the date set forth below.

**DATED** this 11<sup>th</sup> day of January, 2024.

**BUCKLEY LAW P.C.**

By:

  
Taylor L. M. Murdoch, OSB #111307  
tjm@buckley-law.com  
of Attorneys for Petitioner/Mother

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[Z:\CLIENTS\Brown, Heidi\Second Attorney Fee Statement emc.wpd]

**BUCKLEY LAW P.C.**  
5300 Meadows Rd., Suite 200  
Lake Oswego, OR 97035  
T: 503.620.8900 ~ F: 503.620.4878

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## EXHIBIT 1

## Petitioner's Second Statement of Attorney Fees

AFP	09/11/2023	1.20	\$275.00	\$330.00	Professional Fee	Review yellow notice requirements and procedures; Forward to TLM
EMC	08/02/2023	3.00	\$195.00	\$585.00	Professional Fee	Receive pleadings; save to client file; email to client; coordinate transcripts; electronically file pleadings;
EMC	08/03/2023	3.00	\$195.00	\$585.00	Professional Fee	Receive pleadings; save to client file; email to client; coordinate transcripts; electronically file pleadings;
EMC	08/11/2023	4.00	\$195.00	\$780.00	Professional Fee	Review and edit limited judgment; email to Ms. Root for input and review; revise as per Ms. Root; email to Attorney Murdoch.
EMC	09/26/2023	0.20	\$195.00	\$39.00	Professional Fee	Receive email from Arnaud with registration in Mult County; save to file; docket deadline
EMC	09/27/2023	0.90	\$195.00	\$175.50	Professional Fee	Review and finalize Petitioner's Repsonse to Respondent's Objections to Statement of Attorney Fees and Costs; electronically file; email and mail same
EMC	10/06/2023	0.70	\$195.00	\$136.50	Professional Fee	Email to client with sample contempt pleadings. Receive email from Arnaud; forward to client. Email to client with sample enforcement pleadings
EMC	10/10/2023	0.10	\$195.00	\$19.50	Professional Fee	Email from Arnaud to the court; email same to client
EMC	10/12/2023	0.80	\$195.00	\$156.00	Professional Fee	Finalize Motion to Strike; electronically file; email and mail same
EMC	10/23/2023	0.20	\$195.00	\$39.00	Professional Fee	Print declaration for Attorney Murdoch signature; scan and email same to Mr. Stoll
EMC	11/06/2023	1.10	\$195.00	\$214.50	Professional Fee	Draft and finalize motion, declaration and order to withdraw; electronically file; email and mail same
KAS	09/12/2023	0.30	\$340.00	\$102.00	Professional Fee	Confer with Attorney Murdoch regarding case/next steps/llague issues
KAS	11/14/2023	0.20	\$340.00	\$68.00	Professional Fee	Confer with Attorney Murdoch regarding warrant process
KDS	12/29/2023	0.10	\$410.00	\$41.00	Professional Fee	Email to client
KDS	01/02/2024	0.30	\$450.00	\$135.00	Professional Fee	Call with client; confer with Attorney Murdoch
LWD	09/07/2023	0.40	\$140.00	\$56.00	Professional Fee	Organize postage refund for returned international mailing; scan & save customs receipt for successful mailing; scan & file envelopes of failed mailing for posterity
LWD	09/13/2023	0.10	\$140.00	\$14.00	Professional Fee	Save documents received from opposing party
MB	05/31/2023	0.20	\$310.00	\$62.00	Professional Fee	Review emails between client and Attorney Skinner re: DHS
MGV	09/01/2023	0.30	\$125.00	\$37.50	Professional Fee	Compose email correspondence to opposing counsel regarding pleadings in matter.
MGV	09/11/2023	0.20	\$125.00	\$25.00	Professional Fee	Save emails regarding parental abduction and next steps; docket deadline for motion to strike and/or a response.
MGV	09/13/2023	0.20	\$125.00	\$25.00	Professional Fee	Save notice of trial readiness; docket deadline to email Judge Orr's judicial assistant regarding a trial date.
MGV	10/12/2023	0.10	\$125.00	\$12.50	Professional Fee	Mail out copy of Petitioner's Motion to Strike Respondent's Third Motion to Dismiss for Lack of Subject Matter Jurisdiction to opposing party
MKJ	10/19/2023	0.50	\$125.00	\$62.50	Professional Fee	Begin transcribing portion of 07/12/23 hearing
MKJ	10/20/2023	0.50	\$125.00	\$62.50	Professional Fee	Continue to listen to FTR from 07/12/23 to find relevant portion of FTR to have transcribed
MKJ	10/24/2023	0.50	\$125.00	\$62.50	Professional Fee	Call to Jackson County clerk regarding request for clerk's log for FTR from 07/12/23 (2); emails with transcriber regarding transcription request of FTR from 07/12/23
NHM	09/12/2023	0.90	\$310.00	\$279.00	Professional Fee	Draft Limited Judgment regarding attorney fees
NHM	09/20/2023	1.00	\$310.00	\$310.00	Professional Fee	Draft a motion to strike opposing party's motion to dismiss
NHM	09/21/2023	2.80	\$310.00	\$868.00	Professional Fee	Finish drafting the Motion to Strike the opposing party's most recent motion to dismiss
TLM	08/10/2023	0.20	\$380.00	\$76.00	Professional Fee	Receive email with attached pleadings; save to client file; email same to client.
TLM	08/14/2023	0.20	\$380.00	\$76.00	Professional Fee	Email attorney regarding remote appearance
TLM	08/20/2023	0.30	\$380.00	\$114.00	Professional Fee	Email client regarding attorney fee question; email attorney Farrugia
TLM	08/22/2023	0.20	\$380.00	\$76.00	Professional Fee	Receive Notices from the court; download notices and orders; email same to client.
TLM	08/23/2023	0.30	\$380.00	\$114.00	Professional Fee	Emails with client
TLM	08/24/2023	0.30	\$380.00	\$114.00	Professional Fee	Emails with client and attorney Root regarding no fly hearing
TLM	08/28/2023	0.20	\$380.00	\$76.00	Professional Fee	Email client update
TLM	08/29/2023	1.20	\$380.00	\$456.00	Professional Fee	Emails with client and attorney Carty regarding attorney fee statement; email client; prepare statement
TLM	09/01/2023	0.20	\$380.00	\$76.00	Professional Fee	Phone call with attorney Stoll; review and send pleadings to same
TLM	09/05/2023	4.00	\$380.00	\$1,520.00	Professional Fee	Prepare and revise statement of attorney fees and costs; draft cover letter to Arnaud Paris; email Mr. Paris; mail statement
TLM	09/07/2023	0.20	\$380.00	\$76.00	Professional Fee	Mail statement of attorney fees and costs
TLM	09/08/2023	1.00	\$380.00	\$380.00	Professional Fee	Emails with client regarding Arnaud Paris email and motion to dismiss date; review latest Arnaud Paris motion and send to client
TLM	09/12/2023	1.20	\$380.00	\$456.00	Professional Fee	Emails with client and phone conference with Sandrine regarding strategy; email client trial dates; emails regarding trial scheduling
TLM	09/13/2023	1.20	\$380.00	\$456.00	Professional Fee	Draft lengthy summary email to client; email client; phone call and messages with client regarding dividing children as settlement
TLM	09/18/2023	0.20	\$380.00	\$76.00	Professional Fee	Receive email with attached pleadings; save to client file; email same to client.
TLM	10/03/2023	0.20	\$380.00	\$76.00	Professional Fee	Receive email with attached pleadings; save to client file; email same to client.
TLM	10/12/2023	0.20	\$380.00	\$76.00	Professional Fee	Receive email with attached pleadings; save to client file; email same to client.
TLM	10/19/2023	0.40	\$380.00	\$152.00	Professional Fee	Receive multiple emails from Respondent attaching pleadings; save to client file; email same to client.
TLM	10/31/2023	0.20	\$380.00	\$76.00	Professional Fee	Email Re Scheduling



## EXHIBIT 1

## Petitioner's Second Statement of Attorney Fees

TLM	11/09/2023	0.40	\$380.00	\$152.00	Professional Fee	Receive multiple emails from Respondent attaching pleadings; save to client file; email same to client.
TLM	11/13/2023	0.40	\$380.00	\$152.00	Professional Fee	Receive multiple emails from Respondent attaching pleadings; save to client file; email same to client.
TLM	11/13/2023	1.00	\$380.00	\$380.00	Professional Fee	Review and forward five motions to client from Arnaud Paris; email client regarding contempt suggestions; call client
TLM	11/16/2023	0.20	\$380.00	\$76.00	Professional Fee	Receive email with attached pleadings; save to client file; email same to client.
TLM	11/16/2023	0.40	\$380.00	\$152.00	Professional Fee	Send conferral email to Arnaud Paris regarding discovery; email re
TLM	11/20/2023	1.00	\$380.00	\$380.00	Professional Fee	Draft subpoena to attorney Lechman-su; email to Respondent
TLM	11/24/2023	0.20	\$380.00	\$76.00	Professional Fee	Receive email with attached pleadings; save to client file; email same to client.
TLM	11/27/2023	2.00	\$380.00	\$760.00	Professional Fee	Draft Motion to Compel; email client; file same; draft subpoena; email same
TLM	12/11/2023	1.00	\$380.00	\$380.00	Professional Fee	Finalize order for return of children; email client regarding same; draft cover letter to Arnaud Paris; finalize same; draft email to Arnaud Paris encl order
TLM	12/12/2023	0.20	\$380.00	\$76.00	Professional Fee	Emails with client regarding subpoenas
TLM	12/14/2023	0.20	\$380.00	\$76.00	Professional Fee	Receive email with attached pleadings; save to client file; email same to client.
TLM	12/14/2023	3.00	\$380.00	\$1,140.00	Professional Fee	Revise judgment; meet with client; serve pleadings on Respondent.
TLM	12/17/2023	0.20	\$380.00	\$76.00	Professional Fee	Review subpoena records; email client regarding same
TLM	12/18/2023	0.20	\$380.00	\$76.00	Professional Fee	Receive email with attached pleadings; save to client file; email same to client.
TLM	12/19/2023	0.20	\$380.00	\$76.00	Professional Fee	Receive email with attached pleadings; save to client file; email same to client.
TLM	12/20/2023	0.50	\$380.00	\$190.00	Professional Fee	Receive Notices from the court; download notices and orders; email same to client; email subpoena documents to Respondent.
TLM	12/26/2023	0.20	\$380.00	\$76.00	Professional Fee	Receive Notices from the court; download notices and orders; email same to client.
TLM	12/28/2023	1.00	\$380.00	\$380.00	Professional Fee	Receive email with attached pleadings; save to client file; email same to client; email justment to Respondent; debrief with client.
TLM	12/29/2023	0.20	\$380.00	\$76.00	Professional Fee	Receive Notices from the court; download notices and orders; email same to client.
TLM	01/11/2024	2.00	\$395.00	\$790.00	Professional Fee	Prepare statement of attorney fees and costs (actual time 5 hours)
Total:		50.20		\$15,344.50		

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GRAND TOTAL: \$15,948.20

## HARD COSTS:

09/08/2023	\$42.50	Check issued to: Taylor Murdoch - Postage Reimbursement (Pleading to France)
09/12/2023	\$99.97	Check issued to: Thomson Reuters - West Payment Center - Electronic Research (EMC)
09/21/2023	\$95.14	Check issued to: Thomson Reuters - West Payment Center - Electronic Research (NHM)
09/26/2023	\$38.61	Check issued to: Thomson Reuters - West Payment Center - Electronic Research (TLM)
10/26/2023	\$121.75	Check issued to: Lee Berger & Associates, Inc - FTR Transcription (7/13/23 Hearing)
11/08/2023	\$205.73	Check issued to: Thomson Reuters - West Payment Center - Electronic Research (TLM)
Total:		\$603.70



**Employment Eligibility Verification**  
**Department of Homeland Security**  
**U.S. Citizenship and Immigration Services**

**USCIS**  
**Form I-9**  
OMB No. 1615-0047  
Expires 10/31/2022

► **START HERE:** Read instructions carefully before completing this form. The instructions must be available, either in paper or electronically, during completion of this form. Employers are liable for errors in the completion of this form.

**ANTI-DISCRIMINATION NOTICE:** It is illegal to discriminate against work-authorized individuals. Employers **CANNOT** specify which document(s) an employee may present to establish employment authorization and identity. The refusal to hire or continue to employ an individual because the documentation presented has a future expiration date may also constitute illegal discrimination.

**Section 1. Employee Information and Attestation** (*Employees must complete and sign Section 1 of Form I-9 no later than the first day of employment, but not before accepting a job offer.*)

Last Name (Family Name) <b>Paris</b>		First Name (Given Name) <b>Arnaud</b>		Middle Initial <b>N/A</b>	Other Last Names Used (if any) <b>N/A</b>	
Address (Street Number and Name) <b>1111 N Topanga Canyon Blvd</b>		Apt. Number <b>N/A</b>	City or Town <b>Topanga</b>		State <b>CA</b>	ZIP Code <b>90290</b>
Date of Birth (mm/dd/yyyy) <b>04/14/</b>	U.S. Social Security Number <b>0632</b>		Employee's E-mail Address <b>arnaud@skyvr.com</b>		Employee's Telephone Number <b>N/A</b>	

I am aware that federal law provides for imprisonment and/or fines for false statements or use of false documents in connection with the completion of this form.

I attest, under penalty of perjury, that I am (check one of the following boxes):

<input checked="" type="checkbox"/> 1. A citizen of the United States	
<input type="checkbox"/> 2. A noncitizen national of the United States ( <i>See instructions</i> )	
<input type="checkbox"/> 3. A lawful permanent resident (Alien Registration Number/USCIS Number): <b>N/A</b>	
<input type="checkbox"/> 4. An alien authorized to work until (expiration date, if applicable, mm/dd/yyyy): <b>N/A</b> Some aliens may write "N/A" in the expiration date field. ( <i>See instructions</i> )	
<p><i>Aliens authorized to work must provide only one of the following document numbers to complete Form I-9:  An Alien Registration Number/USCIS Number OR Form I-94 Admission Number OR Foreign Passport Number.</i></p> <p>1. Alien Registration Number/USCIS Number: <b>N/A</b>  <b>OR</b>  2. Form I-94 Admission Number: <b>N/A</b>  <b>OR</b>  3. Foreign Passport Number: <b>N/A</b>  Country of Issuance: <b>N/A</b></p>	
<p align="center">QR Code - Section 1 Do Not Write in This Space</p>	

Signature of Employee <i>Arnaud Paris</i>	Today's Date (mm/dd/yyyy) <b>12/12/2022</b>
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**Preparer and/or Translator Certification (check one):**

☒ I did not use a preparer or translator. ☐ A preparer(s) and/or translator(s) assisted the employee in completing Section 1.  
*(Fields below must be completed and signed when preparers and/or translators assist an employee in completing Section 1.)*

I attest, under penalty of perjury, that I have assisted in the completion of Section 1 of this form and that to the best of my knowledge the information is true and correct.

Signature of Preparer or Translator		Today's Date (mm/dd/yyyy)	
Last Name (Family Name)		First Name (Given Name)	
Address (Street Number and Name)		City or Town	State ZIP Code



*Employer Completes Next Page*





**Employment Eligibility Verification**  
**Department of Homeland Security**  
**U.S. Citizenship and Immigration Services**

**USCIS**  
**Form I-9**  
 OMB No. 1615-0047  
 Expires 10/31/2022

**Section 2. Employer or Authorized Representative Review and Verification**

(Employers or their authorized representative must complete and sign Section 2 within 3 business days of the employee's first day of employment. You must physically examine one document from List A OR a combination of one document from List B and one document from List C as listed on the "Lists of Acceptable Documents.")

<b>Employee Info from Section 1</b>	Last Name (Family Name) Paris	First Name (Given Name) Arnaud	M.I. 	Citizenship/Immigration Status 1
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List A Identity and Employment Authorization	OR	List B Identity	AND	List C Employment Authorization
Document Title US Passport		Document Title N/A		Document Title N/A
Issuing Authority United States		Issuing Authority N/A		Issuing Authority N/A
Document Number 0583		Document Number N/A		Document Number N/A
Expiration Date (if any) (mm/dd/yyyy) 05/01/2027		Expiration Date (if any) (mm/dd/yyyy) N/A		Expiration Date (if any) (mm/dd/yyyy) N/A
Document Title N/A		<div align="center"> <b>Additional Information</b> </div> <div align="center">           QR Code - Sections 2 &amp; 3            Do Not Write In This Space         </div>		
Issuing Authority N/A				
Document Number N/A				
Expiration Date (if any) (mm/dd/yyyy) N/A				
Document Title N/A				
Issuing Authority N/A				
Document Number N/A				
Expiration Date (if any) (mm/dd/yyyy) N/A				

**Certification:** I attest, under penalty of perjury, that (1) I have examined the document(s) presented by the above-named employee, (2) the above-listed document(s) appear to be genuine and to relate to the employee named, and (3) to the best of my knowledge the employee is authorized to work in the United States.

The employee's first day of employment (mm/dd/yyyy): 12/12/2022 (See instructions for exemptions)

Signature of Employer or Authorized Representative <i>Jan Goetgeluk</i>	Today's Date (mm/dd/yyyy) 12/12/2022	Title of Employer or Authorized Representative CEO	
Last Name of Employer or Authorized Representative Goetgeluk	First Name of Employer or Authorized Representative Jan	Employer's Business or Organization Name Virtuix Inc	
Employer's Business or Organization Address (Street Number and Name) 1826 Kramer Ln, Suite H	City or Town Austin	State TX	ZIP Code 78758

**Section 3. Reverification and Rehires (To be completed and signed by employer or authorized representative.)**

<b>A. New Name (if applicable)</b>			<b>B. Date of Rehire (if applicable)</b>	
Last Name (Family Name)	First Name (Given Name)	Middle Initial	Date (mm/dd/yyyy)	

**C. If the employee's previous grant of employment authorization has expired, provide the information for the document or receipt that establishes continuing employment authorization in the space provided below.**

Document Title	Document Number	Expiration Date (if any) (mm/dd/yyyy)
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I attest, under penalty of perjury, that to the best of my knowledge, this employee is authorized to work in the United States, and if the employee presented document(s), the document(s) I have examined appear to be genuine and to relate to the individual.

Signature of Employer or Authorized Representative	Today's Date (mm/dd/yyyy)	Name of Employer or Authorized Representative
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**LISTS OF ACCEPTABLE DOCUMENTS****All documents must be UNEXPIRED**

Employees may present one selection from List A  
or a combination of one selection from List B and one selection from List C.

LIST A Documents that Establish Both Identity and Employment Authorization	OR	LIST B Documents that Establish Identity	AND	LIST C Documents that Establish Employment Authorization
1. U.S. Passport or U.S. Passport Card		1. Driver's license or ID card issued by a State or outlying possession of the United States provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address		1. A Social Security Account Number card, unless the card includes one of the following restrictions: (1) NOT VALID FOR EMPLOYMENT (2) VALID FOR WORK ONLY WITH INS AUTHORIZATION (3) VALID FOR WORK ONLY WITH DHS AUTHORIZATION
2. Permanent Resident Card or Alien Registration Receipt Card (Form I-551)		2. ID card issued by federal, state or local government agencies or entities, provided it contains a photograph or information such as name, date of birth, gender, height, eye color, and address		2. Certification of report of birth issued by the Department of State (Forms DS-1350, FS-545, FS-240)
3. Foreign passport that contains a temporary I-551 stamp or temporary I-551 printed notation on a machine-readable immigrant visa		3. School ID card with a photograph		3. Original or certified copy of birth certificate issued by a State, county, municipal authority, or territory of the United States bearing an official seal
4. Employment Authorization Document that contains a photograph (Form I-766)		4. Voter's registration card		4. Native American tribal document
5. For a nonimmigrant alien authorized to work for a specific employer because of his or her status: a. Foreign passport; and b. Form I-94 or Form I-94A that has the following: (1) The same name as the passport; and (2) An endorsement of the alien's nonimmigrant status as long as that period of endorsement has not yet expired and the proposed employment is not in conflict with any restrictions or limitations identified on the form.		5. U.S. Military card or draft record		5. U.S. Citizen ID Card (Form I-197)
		6. Military dependent's ID card		6. Identification Card for Use of Resident Citizen in the United States (Form I-179)
		7. U.S. Coast Guard Merchant Mariner Card		7. Employment authorization document issued by the Department of Homeland Security
		8. Native American tribal document		
		9. Driver's license issued by a Canadian government authority		
		For persons under age 18 who are unable to present a document listed above:		
		10. School record or report card		
		11. Clinic, doctor, or hospital record		
		12. Day-care or nursery school record		
6. Passport from the Federated States of Micronesia (FSM) or the Republic of the Marshall Islands (RMI) with Form I-94 or Form I-94A indicating nonimmigrant admission under the Compact of Free Association Between the United States and the FSM or RMI				

Examples of many of these documents appear in the Handbook for Employers (M-274).

Refer to the instructions for more information about acceptable receipts.